REMARKS

Claims 1-32 are pending in the application. By this Amendment Applicant has amended claims 15, 24 and 29.

Claim Rejections Under 35 U.S.C. §112

In response to the Examiner's rejection of claim 15 as being indefinite, Applicant has amended the claim to delete the word "the" from the recitation of "the first and second items", thus eliminating the implication of the existence of antecedent basis for this recitation. Accordingly, Applicant respectfully requests reconsideration of this rejection.

Claim Rejections Under 35 U.S.C. §101

In the above Office Action the Examiner rejected claims 24-32 as being directed to non-statutory subject matter. In particular, the Examiner has stated that the language within these claims raises a question as to whether the claimed files are directed merely to an abstract idea. In addition, the Examiner has indicated that these claims are not embodied in a computer readable medium.

By this Amendment Applicant has amended independent claims 24 and 29 to recite that the claimed report files are encoded on a computer-readable medium and used by a computer in connection with the generation of output reports.

Accordingly, in view of the amendments and remarks described above, Applicant respectfully requests the Examiner to reconsider the outstanding rejection of claims 24-32 under 35 U.S.C. §101.

Claim Rejections Under 35 U.S.C. §102

The Examiner rejected claims 1, 2, 4, 7, 8, 11, 13, 15, 19-26 and 28-32 under 35 U.S.C. §102(e) as being anticipated by Wagner (U.S. Pub. No. 20030233296).

Wagner System

Wagner describes a system for preparing completed forms using information accessed from a remote database. In the Wagner system it is assumed that the prescribed format of the forms to be completed is predefined prior to initiating the process of completing a given form.

Such formats may include, for example, those corresponding to official government forms such as those used by government agencies:

> The form generation engine 1 could use the received data to generate any type of forms, for example, official government forms. These forms could be printed locally, or filed with an entity, such as a government agency, over a network.
> [0036]

> Additionally, the database could be a form repository holding information concerning various forms. The information held in the form repository could include the form layout, the information fields required by the form, or the form itself, for example.
> [0030]

Because the layout and other attributes of the forms used in the Wagner system are predefined, the Wagner system does not include any mechanism for enabling a user to define the layout of a form by, for example, selecting from among various available page or field types. Instead, within the Wagner system a completed form is generated in accordance with a predefined form layout by retrieving data from a remote database and inserting it into fields or locations specified by the predefined form. For example, Wagner describes the process of generating a completed tax form using a predefined tax form layout provided by the Internal Revenue Service IRS:

> [0074] An example of an application of this system according to one embodiment of the invention is illustrated in FIG. 8. Referring to FIG. 8, a method for retrieving tax data from the IRS and generating IRS forms and state forms is described. ...

> [0077] Next, as shown in step 804, a tax form corresponding to the relevant information is generated. Preferably, the filtered data would be presented in a format which would match the prescribed form. The entire form could be generated by the system in a prescribed format including the relevant data.

Accordingly, Wagner is concerned with addressing the problem of retrieving information from a remote database and arranging the retrieved information in a format prescribed by a predefined form, such as a tax return, in order to generate a completed form based upon the retrieved information.

System of the Invention

In general terms the present invention relates to a method of designing a report file used for automatic report generation as well as to a report generation method utilizing such a report file. The inventive method of designing a report file includes enabling a user to specify a structure of the report file by defining a first report group comprised of one or more page definitions. The first report group may be of a first group type selected by the user from among a plurality of predefined group types. The user may also specify that the report file associate a first data source with the first report group. The method of designing the report file also permits a user to identify one or more fields for inclusion within each of the one or more page definitions. In addition, the user may specify an association between content from the first data source and each of the one or more fields.

In one embodiment the system of the invention enables the automated creation of reports in the Portable Document File (i.e., "PDF") format based upon the contents of database 132. The inventive automated report building process obviates the need for tedious, time-consuming manual coding of customized report writer routines and thereby facilitates efficient, cost-effective report production.

Differences Between the System of the Present Invention and the Cited Reference

A primary difference between the inventive system and the system described by Wagner is that Wagner system does not utilize, or enable a user to design, report files of the type contemplated by the present invention. This is largely because the Wagner system is directed to generating completed forms in accordance with predefined form layouts (e.g., standardized tax return form layouts), and does not provide the user with the capability to design such layouts. In contrast, the system of the invention provides the user with the opportunity to design a form by, for example, selecting from among various report groups comprised of various page definitions and identifying fields for inclusion within such page definitions. Although a user of the Wagner system may request that a form of given predefined type (e.g., a tax return form) be populated with information from a database, the Wagner system does not provide the user with the opportunity to design a form in the manner contemplated by the invention.

In the rejection of claim 1 in the above Office Action, the Examiner indicates that Wagner describes the claim element of "specifying a structure of the report file by defining a first report group comprised of one or more page definitions, the first report group being of a first group type selected from among a plurality of predefined group types", since Wagner teaches "configuring the report in a specific format determined by the group and the page definitions with the group being a type of tax return and the definitions being the information to include". Applicant respectfully submits that a user of the Wagner system does not in any way specify a structure of a report file by defining a first group comprised of one or more page definitions, where the user selects from among a plurality of predefined group types. Rather, in the Wagner system the user merely indicates which of one or more predefined forms it is desired to populate with information from a database. Specifically, Wagner provides no mechanism to enable a user to specify a report structure by, among other things, selecting from a plurality of predefined group types.

The Examiner appears to be adopting the position that because the Wagner system uses predefined layout information to generate a completed form containing pages, fields and the like, it follows that the Wagner system teaches specification of a report structure in the manner contemplated the invention. Applicant respectfully submits that even if the predefined layout information utilized in the Wagner system effectively defines a report structure containing a plurality of pages and fields, that in no way suggests that Wagner contemplates the method of designing report file contemplated by claim 1. That is, Applicant respectfully submits that it is necessary to point out the operations within the Wagner system corresponding to those of the claimed invention, and it is insufficient to assert that various similarities between Wagner's predefined form layout information and the result of the method of claim 1 (i.e., a report file definition) suggest or require that the intermediary acts are performed in the claimed manner. In point of fact Wagner provides a user with no discretion to specify, choose or select anything other than a predefined form structure in its entirety, and thus teaches away from the designing of a report file using the sequence of intermediary acts recited in claim 1.

Turning again to the specifics of the rejection of claim 1, the Examiner asserts that Wagner teaches that the IRS database may be associated with a federal tax return and that this

corresponds to the claimed "associating a first data source with the first report group" Applicant

respectfully submits that the portion of Wagner cited in this regard (i.e., p. 2, para. 34, p. 3, para.

41, 45 and p.6, para. 70) fail to describe or suggest association of a data source with a report

group or even the association of the IRS database with a tax return. Rather, these sections of

Wagner merely describe the manner in which Wagner's "data acquisition module 102" retrieves

data from a remote database, such as the IRS database. No "association" is established within

the Wagner system between the IRS database and either an individual tax return or predefined

form. In fact, Wagner teaches away from the creation of such an association by requiring that

the user, rather than the Wagner system itself, establish a connection with the IRS database:

> [0070] Referring to FIG. 7, a method for acquiring and formatting data according
> to a preferred embodiment will now be described. <u>First, a user connects to a remote
> database, as shown in Step 701</u>. This is preferably done over a network. The network
> could be a local area network, a wide area network, or the Internet. Alternatively, a direct
> connection could be established. Additionally, the remote database is preferably an
> official government database that requires access privileges to connect. The security and
> access rights would also be negotiated between the user and the remote database.

Considering further the rejection of claim 1, the Examiner indicates that Wagner

describes "identifying one or more fields for inclusion within each of the one or more page

definitions" since Wagner "teaches identifying information included within the report". For

support of this contention the Examiner cites Wagner at p. 3, para. 43, 46; and p. 6, para. 71, 72.

Applicant respectfully submits that Wagner fails to teach any mechanism for enabling a user to

identify particular "fields" to be included within a report since, again, Wagner affords a user no

discretion in specifying distinct elements of a report structure such as fields. The portions of

Wagner cited by the Examiner all relate to the manner in which Wagner retrieves and filters

<u>content</u> required to be inserted into the applicable predefined layout form currently being utilized

within the Wagner system. Applicant further respectfully submits that alleging that the

"information included within the report" corresponds to the claimed identification of fields is

inconsistent with the last element of claim 1, which recites that an association is specified

between content from a data source and such fields. That is, the claimed "fields" relate to the

manner in which content is to be arranged in a report generated using the inventive report file, and not to specific content itself as indicated by the Examiner.

Finally, the Examiner states that the last element of claim 1 is described by Wagner since "Wagner teaches an association between retrieved content and the fields since the content is filtered to be included in a report". To the best of Applicant's understanding, the Examiner appears to be contending that Wagner's filtering of data retrieved from a remote database corresponds to the claimed specifying an association. Applicant fails to appreciate how "filtering" can correspond to a claimed act of "specifying". That is, even if Wagner in fact "teaches an association" exists in some way, this in no way suggests that Wagner provides a mechanism for "specifying an association" as presently claimed. Moreover, Applicant respectfully submits that merely filtering data retrieved from a database to remove extraneous information not required by a form being populated in no way suggests specifying, for inclusion within a report file, an association between content from a data source and fields defined in the report file. Finally, the filtering criteria used within the Wagner system is not used in connection with designing any structure analogous to the claimed report file, but instead is simply included in filter module 103 (see, e.g., FIG. 3 of Wagner).

Accordingly, Applicant respectfully requests reconsideration of the outstanding rejection of independent claim 1, and associated dependent claims 2 and 4 under 35 U.S.C. §102(e) as being anticipated by Wagner. Given the similarity of recitations in independent claim 1 to those in independent claim 7, Applicant further requests consideration of the outstanding rejection of independent claim 7, and associated dependent claims 8, 11, 13 and 15 under 35 U.S.C. §102(e) as being anticipated by Wagner.

Turning now to the rejection of claim 19, Applicant observes that the report generation system of claim 19 includes a client unit configured to execute plural client components, a server unit configured to execute plural server components, and a database server. Even accepting for the sake of discussion the Examiner's contention that Wagner's workstation 1 corresponds to the claimed client unit and Wagner's government database 3a corresponds to the claimed database server, Wagner's system lacks a server corresponding to the claimed server unit. In this regard each of the sections of Wagner cited by the Examiner appear to pertain to software components

executed by the workstation 1, and do not describe or suggest execution of any components by a server.

Accordingly, Applicant respectfully requests reconsideration of the outstanding rejection of independent claim 19, and associated dependent claims 20-23, under 35 U.S.C. §102(e) as being anticipated by Wagner.

Turning now to claim 24, the Examiner asserts that the claimed report file includes the claimed database query identifying a data source because "Wagner teaches querying a database to retrieve information". Even assuming for the sake of discussion that Wagner so teaches querying a database, Applicant respectfully submits that the Examiner has not identified within Wagner a report file containing a database query as presently claimed. Similarly, even assuming that Wagner utilizes "data filter information" as stated by the Examiner, the Examiner has not identified within Wagner a report file containing the claimed data filter information.

Accordingly, Applicant respectfully requests reconsideration of the outstanding rejection of independent claim 24, and associated dependent claims 25-26 and 28, under 35 U.S.C. §102(e) as being anticipated by Wagner. Given the similarity of the recitations of independent claims 24 and 29, Applicant similarly requests reconsideration of the of the outstanding rejection of independent claim 29, and associated dependent claims 30-32, under 35 U.S.C. §102(e) as being anticipated by Wagner.

In the above Office Action the Examiner has rejected dependent claims 3, 5-6, 9-10, 12, 14, 16-18, and 27 under 35 U.S.C. §103(a) as being unpatentable over Wagner in view of various other references. Because such other references do not address any of the deficiencies of Wagner discussed above with respect to the pending independent claims, Applicant also respectfully requests reconsideration of the outstanding rejection of dependent claims 3, 5-6, 9-10, 12, 14, 16-18, and 27.

Applicant respectfully requests consideration of the remarks herein prior to further examination of the above-identified application. The undersigned would of course be available to discuss the present application with the Examiner if, in the opinion of the Examiner, such a discussion could lead to resolution of any outstanding issues.

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